

# Exhibit 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE APPLICATION OF Sakab Saudi Holding :  
Company, Alpha Star Aviation Services Company, :  
Enma Al Ared Real Estate Investment and Development :  
Company, Kafa'at Business Solutions Company, : Misc. Civil Action No \_\_\_\_\_  
Security Control Company, Armour Security Industrial :  
Manufacturing Company, Saudi Technology & Security :  
Comprehensive Control Company, Technology Control :  
Company, New Dawn Contracting Company, and Sky :  
Prime Investment Company, :  
:  
:  
:  
For Order Pursuant to 28 U.S.C. § 1782 for the Issuance :  
of Subpoenas to Citibank NA, HSBC Bank USA NA, :  
Cadwalader, Wickersham & Taft LLP, and Jonathan :  
Wainwright, Esq. :  
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**[PROPOSED] ORDER GRANTING *EX PARTE* APPLICATION PURSUANT TO 28  
U.S.C. § 1782 FOR THE ISSUANCE OF SUBPOENAS TO CITIBANK NA, HSBC BANK  
USA NA, CADWALADER, WICKERSHAM & TAFT LLP, AND JONATHAN  
WAINWRIGHT, ESQ.**

WHEREAS, the application of the Applicants for an order pursuant to 28 U.S.C. § 1782  
authorizing the issuance of subpoenas to Citibank NA, HSBC Bank USA NA, Cadwalader,  
Wickersham & Taft LLP, and Jonathan Wainwright, Esq., came on *ex parte*;

WHEREAS, on January 22, 2021, the Applicants obtained an order from the Honorable  
Justice Gilmore of the Superior Court of Justice, Ontario (the “January 22 Order”), requiring  
certain entities and people—including Citibank NA, HSBC Bank USA NA, Cadwalader,  
Wickersham & Taft LLP, and Jonathan Wainwright, Esq.—to produce specific records, and  
requesting judicial assistance from, *inter alia*, this Court to give effect to her order;

WHEREAS, by the Application, the Applicants seek to give effect to the January 22 Order by authorizing them to serve subpoenas on Citibank NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright, Esq.;

WHEREAS, the Applicants seek to serve these subpoenas to obtain documents in aid of a civil action already filed in the Superior Court of Justice, Ontario against certain individuals;

WHEREAS, under the terms of the January 22 Order, the Applicants shall pay the reasonable costs incurred in complying with the terms of any subpoena.

**IT IS HEREBY ORDERED**, that

1. The Application is GRANTED, and the Applicants may serve the subpoenas attached as Exhibits 1 through 4 to the Declaration of Jonathan S. Sack, Esq., dated February 10, 2021 (the “Subpoenas”) on the Citibank NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright, Esq.

2. The Applicants shall pay the reasonable costs incurred by Citibank NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright, Esq. in responding to the Subpoenas.

Dated: February \_\_, 2021  
New York, New York

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UNITED STATES DISTRICT JUDGE

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE APPLICATION OF SAKAB SAUDI HOLDING COMPANY, ALPHA STAR AVIATION SERVICES COMPANY, ENMA AL ARED REAL ESTATE INVESTMENT AND DEVELOPMENT COMPANY, KAFA'AT BUSINESS SOLUTIONS COMPANY, SECURITY CONTROL COMPANY, ARMOUR SECURITY INDUSTRIAL MANUFACTURING COMPANY, SAUDI TECHNOLOGY & SECURITY COMPREHENSIVE CONTROL COMPANY, TECHNOLOGY CONTROL COMPANY, NEW DAWN CONTRACTING COMPANY, AND SKY PRIME INVESTMENT COMPANY,

For Order Pursuant to 28 U.S.C. § 1782 for the Issuance of Subpoenas to Citibank NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright, Esq.

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**[PROPOSED] ORDER GRANTING *EX PARTE* APPLICATION PURSUANT TO 28 U.S.C. § 1782 FOR THE ISSUANCE OF SUBPOENAS TO CITIBANK NA, HSBC BANK USA NA, CADWALADER, WICKERSHAM & TAFT LLP, AND JONATHAN WAINWRIGHT, ESQ.**

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